

UNITED STATES DISTRICT COURT

for the

Southern District of New York

Civil Division

	)	Case No.
Michael Buxbaum	)	(to be filled in by the Clerk's Office)
Plaintiff(s)	)	
(Write the full name of each plaintiff who is filing this complaint.	)	
If the names of all the plaintiffs cannot fit in the space above,	)	
please write "see attached" in the space and attach an additional	)	
page with the full list of names.)	)	
-v-	)	
	)	
	)	
	)	
	)	
JetBlue Airways Corporation	)	
Defendant(s)	)	
(Write the full name of each defendant who is being sued. If the	)	
names of all the defendants cannot fit in the space above, please	)	
write "see attached" in the space and attach an additional page	)	
with the full list of names.)	)	

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Michael Buxbaum
Street Address	7491 N Federal Hwy 125
City and County	Boca Raton and Palm Beach County
State and Zip Code	Florida and 33487
Telephone Number	
E-mail Address	

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	JetBlue Airways Corporation
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Job or Title ( <i>if known</i> )	
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Street Address	
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City and County	New York City and Queens
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State and Zip Code	New York
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Telephone Number	
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E-mail Address ( <i>if known</i> )	
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## Defendant No. 2

Name	
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Job or Title ( <i>if known</i> )	
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Street Address	
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City and County	
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State and Zip Code	
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Telephone Number	
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E-mail Address ( <i>if known</i> )	
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## Defendant No. 3

Name	
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Job or Title ( <i>if known</i> )	
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Street Address	
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City and County	
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State and Zip Code	
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Telephone Number	
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E-mail Address ( <i>if known</i> )	
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## Defendant No. 4

Name \_\_\_\_\_

Job or Title *(if known)* \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address *(if known)* \_\_\_\_\_**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question ☒ XX

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

1. False Claims Act 31 U.S. Code § 3729 - False claims

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of  
State of *(name)* \_\_\_\_\_.

b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,

and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign* \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, *(name)* \_\_\_\_\_, is incorporated  
the laws of the State of *(name)* \_\_\_\_\_, and has its  
principal place of business in the State of *(name)* \_\_\_\_\_.  
Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_,  
and has its principal place of business in *(name)* \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount  
at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

Florida

- 
- B. What date and approximate time did the events giving rise to your claim(s) occur?  
2025

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- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

Defendant JetBlue Airways Corporation is making False Claims and fraudulently communicating travel information with the scheduling of flights that are not actually scheduled and flying passengers wherever and whenever Defendant JetBlue Airways Corporation chooses for a low fare to make False Claims to the United States Government for money and committing fraud in spending such dollars thereby communicating fraudulent information to the Plaintiff Michael Buxbaum in flying domestically.

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#### **IV. Irreparable Injury**

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Monetary damages at a later time would not adequately compensate me for the injuries I sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured because Defendant JetBlue Airways Corporation is only scheduling domestic flight.

**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

- 1) Order Defendant JetBlue Airways Corporation to schedule airplane travel on a regularly scheduled basis for the same low fare,
  - 2) Order Defendant JetBlue Airways Corporation to pay Plaintiff, Michael Buxbaum, \$5,500,000 for False Claims Act 31 U.S. Code § 3729 - False claims,
  - 3) Order Defendant JetBlue Airways Corporation to pay Plaintiff, Michael Buxbaum, \$93,931,548 for wrongful and intentional and repeated violation of False Claims Act 31 U.S. Code § 3729 - False claims,
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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: April 1, 2025

Signature of Plaintiff



Printed Name of Plaintiff

Michael Buxbaum

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**B. For Attorneys**

Date of signing:

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Signature of Attorney

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Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

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Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address